

**REDACTED – FOR PUBLIC INSPECTION**

*Before the*  
**Federal Communications Commission**  
**Washington, D.C. 20554**

In the Matter of: )  
)  
Applications of CHARTER COMMUNICATIONS, )  
INC., TIME WARNER CABLE INC., and ) WC Dkt. No. 16-197  
BRIGHT HOUSE NETWORKS, LLC for Consent To )  
Assign or Transfer Control of Licenses and )  
Authorizations )

**INDEPENDENT COMPLIANCE OFFICER’S REPORT ON CHARTER’S  
ANNUAL INTERCONNECTION REPORT**

**OCTOBER 15, 2019**

Hon. Barbara S. Jones (Ret.)  
BRACEWELL LLP  
1251 Avenue of the Americas  
New York, NY 10020

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### **INTRODUCTION**

On May 10, 2016, the Federal Communications Commission (“FCC”) issued an order (the “Merger Order”) approving the merger of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership (as a combined entity, “Charter” or the “Company”), subject to certain conditions. (Mem. Op. & Order, 31 FCC Rcd. 6327 (2016).) On August 17, 2016, the FCC appointed the Honorable Barbara S. Jones (ret.) as Independent Compliance Officer (“ICO”). The ICO is to monitor and assess the Company’s compliance with the Conditions and submit reports that detail Charter’s compliance efforts.

On August 16, 2019, Charter filed its third annual report (the “2019 Annual Report”) pursuant to the Settlement-Free Interconnection Condition (the “Interconnection Condition” or the “Condition”). This report addresses Charter’s progress on satisfying that Condition.<sup>1</sup>

### **EXECUTIVE SUMMARY**

Based on the ICO’s assessment of information Charter has presented to the ICO, interviews the ICO has conducted of Charter personnel, and the ICO’s review of documents and materials, the ICO believes that Charter is in compliance with the Interconnection Condition.

### **COMPLIANCE WITH THE INTERCONNECTION CONDITION**

The ICO’s observations regarding Charter’s compliance are set forth in detail below. As always, the ICO’s observations are as of at this point in time; the ICO’s assessment of Charter’s compliance with the Condition will continue to be shaped by additional materials received and interviews conducted.

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<sup>1</sup> The Interconnection Condition is set forth at § III of Appendix B of the Merger Order.

**I. OBSERVATIONS**

**A. Charter’s General Approach to Satisfying the Condition**

As discussed in the ICO’s 2017 Annual Interconnection Report, following the merger Charter **[BEGIN HIGHLY CONFIDENTIAL MATERIAL]**

**[END HIGHLY CONFIDENTIAL MATERIAL]**

**B. Interconnection Requests and Executed Agreements**

The Interconnection Condition requires that Charter enter “into an Interconnection Agreement consistent with the terms set forth in Attachment 1 with any Person that qualifies under the terms of Attachment 1.” App’x B § III(2)(a). Assessing compliance with this provision involves ensuring (i) that Charter is permitting all parties that satisfy the terms of Attachment 1 to interconnect, and (ii) that the terms of the agreements governing such interconnection relationships are consistent with Attachment 1.

**1. Requests for Interconnection**

To assess whether Charter is permitting all parties that satisfy the terms of Attachment 1 to interconnect, the ICO examined **[BEGIN HIGHLY CONFIDENTIAL MATERIAL]**

**[END HIGHLY CONFIDENTIAL MATERIAL]**

In sum, the ICO believes that Charter is appropriately permitting parties to interconnect.

**2. Executed Agreements**

**[BEGIN HIGHLY CONFIDENTIAL MATERIAL]**

**[END HIGHLY CONFIDENTIAL MATERIAL]**

**CONCLUSION**

**[BEGIN HIGHLY CONFIDENTIAL MATERIAL]**

**[END HIGHLY**

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<sup>2</sup> **[BEGIN HIGHLY CONFIDENTIAL MATERIAL]**

**[END HIGHLY CONFIDENTIAL MATERIAL]**

<sup>3</sup> Additionally, as required by the Condition, Charter continues to post Attachment 1 on the IP Interconnection & Peering Policies page of its website (<https://www.spectrum.com/policies/ip-interconnection.html>), and it continues to operate PoPs at the ten locations listed in Attachment 1. *See* App'x B § III(2)(b) & (d).

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**CONFIDENTIAL MATERIAL]** the ICO believes that Charter is in compliance with the terms of the Interconnection Condition.